

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ANDY KIM, in his personal capacity as
a candidate for U.S. Senate, ANDY KIM
FOR NEW JERSEY, SARAH
SCHOENGOOD, SARAH FOR NEW
JERSEY, CAROLYN RUSH and
CAROLYN RUSH FOR CONGRESS;

Plaintiffs,

v.

CHRISTINE GIORDANO HANLON,
in her official capacity as Monmouth
County Clerk, et al.,

Defendants.

- and -

DALE A. CROSS, in his official
capacity as Salem County Clerk, et al.

As Interested Parties.

Civ. Action. No.: 3:24-cv-1098
(ZNQ)(TJB)

Proposed Order

THIS MATTER, having been brought before the Court on the application of Genova Burns LLC, attorneys for defendants, Christopher J. Durkin, Joanne Rajoppi, and Danielle Ireland-Imhof (“Defendants”), for an order granting Defendants’ motion *in limine*; and notice having been given to all counsel of record; and the Court having considered the papers submitted in connection with this application, together with any opposition filed; and good cause having been shown;

IT IS ON THIS _____ day of _____ 2024, **ORDERED** as follows:

1. Defendants' motion to exclude the expert testimony of Andrew W. Appel, a proffered expert witness of Plaintiffs, for the preliminary injunction hearing is hereby GRANTED.
2. This Order shall be deemed served on all parties upon filing of same on the Court's electronic filing system.

U.S.D.J.

Opposed _____

Unopposed _____